

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOOGLE LLC,

Plaintiff,

v.

DMITRY STAROVIKOV;
ALEXANDER FILIPPOV;
Does 1-15,

Defendants.

Civil Action No. 1:21-cv-10260-DLC

NOTICE OF MOTION FOR SANCTIONS

Pursuant to Federal Rules of Civil Procedure 26(g), 37(b), (c), (e), and (f), and the Court's inherent powers, Plaintiff Google LLC ("Google") respectfully moves the Court for entry of a default judgment and an award of attorneys' fees against Defendants Dmitry Starovikov and Alexander Filippov (collectively, "Defendants") and their counsel Igor Litvak.

The relief sought by Google is made upon the accompanying Memorandum of Law, the Declaration of Laura Harris in Support of Google's Motion for Sanctions, and the Proposed Order filed herewith.

DATED: August 22, 2022

Respectfully submitted,

/s/ Laura Harris

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